

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re: Methyl Tertiary Butyl Ether (“MTBE”)
Products Liability Litigation

Master File No. 1:00-1898 (SAS)
MDL 1358

This document relates to:

*Commonwealth of Pennsylvania v. Exxon
Mobil Corporation, et al.*, Case No. 14-cv-
06228

**DEFENDANTS CONOCOPHILLIPS COMPANY AND PHILLIPS 66 COMPANY’S
RESPONSES TO PLAINTIFF’S THIRD REQUEST FOR PRODUCTION**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, ConocoPhillips Company and Phillips 66 Company (“Defendants”), by and through their attorney, Stephen C. Dillard, Norton Rose Fulbright, hereby responds to Plaintiff’s Third Request for Production of Documents (“the Requests”), as follows:

GENERAL OBJECTION

Defendants object to the definition of “YOU” and “YOUR” as overly broad and unduly burdensome by including “affiliates, subsidiaries, predecessors, agents and employees”.

REQUEST NO. 1:

All DOCUMENTS which mention, CONCERN or refer to any funding provided to Charles River Laboratories, Inc. with respect to the Methyl Tertiary Butyl Ether (MTBE): Two-Year Combined Chronic Toxicity/Carcinogenicity Drinking Water Study in Wistar Rates (the “Study”).

RESPONSE: Following a reasonable search, Defendants have located no documents responsive to this request.

REQUEST NO. 2:

A copy of all contracts or agreements between YOU and Charles River Laboratories, Inc. which mention, CONCERN or refer to the Study.

RESPONSE: Following a reasonable search, Defendants have located no documents responsive to this request.

REQUEST NO. 3:

All COMMUNICATIONS between YOU and Charles River Laboratories, Inc. which mention, CONCERN or refer to the Study.

RESPONSE: Following a reasonable search, Defendants have located no documents responsive to this request.

REQUEST NO 4:

All DOCUMENTS YOU received from, or sent to, Charles River Laboratories, Inc. which mention, CONCERN or refer to the Study.

RESPONSE: Following a reasonable search, Defendants have located no documents responsive to this request.

REQUEST NO 5:

All DOCUMENTS YOU received from, or sent to, the Pathology Working Group which mention, CONCERN or refer to the Study.

RESPONSE: Following a reasonable search, Defendants have located no documents responsive to this request.

REQUEST NO. 6:

All COMMUNICATIONS between YOU and the Pathology Working Group which mention, CONCERN or refer to the Study.

RESPONSE: Following a reasonable search, Defendants have located no documents responsive to this request.

REQUEST NO. 7:

All COMMUNICATIONS between YOU and Shari A. Price which mention, CONCERN or refer to the Study.

RESPONSE: Following a reasonable search, Defendants have located no documents responsive to this request.

REQUEST NO. 8:

All COMMUNICATIONS between YOU and Kevin McDorman which mention, CONCERN or refer to the Study.

RESPONSE: Following a reasonable search, Defendants have located no documents responsive to this request.

REQUEST NO. 9:

All COMMUNICATIONS between YOU and Hussain Shaffi which mention, CONCERN or refer to the Study.

RESPONSE: Following a reasonable search, Defendants have located no documents responsive to this request.

REQUEST NO. 10:

All COMMUNICATIONS between each of YOU which mention, CONCERN or refer to the Study and/or the Final Report Amendment No. 1.

RESPONSE: Following a reasonable search, Defendants have located no documents responsive to this request.

REQUEST NO. 11:

All COMMUNICATIONS between YOU and the United States Environmental Protection Agency which mention, CONCERN or refer to the Study and/or the Final Report Amendment No. 1.

RESPONSE: Following a reasonable search, Defendants have located no documents responsive to this request.

REQUEST NO. 12:

All COMMUNICATIONS between YOU and the California Office of Environmental Health Hazard Assessment which mention, CONCERN or refer to the Study and/or the Final Report Amendment No. 1.

RESPONSE: Following a reasonable search, Defendants have located no documents responsive to this request.

Dated: January 4, 2019.

/s/ Stephen C. Dillard
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**ATTORNEY FOR CONOCOPHILLIPS
COMPANY AND PHILLIPS 66 COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2019 a copy of the foregoing document was served electronically on all counsel of record in accordance with the Federal Rules of Civil Procedure.

/s/ Stephen C. Dillard
Stephen C. Dillard